

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BROADCAST MUSIC, INC.; UNIVERSAL - SONGS)	
OF POLYGRAM INTERNATIONAL, INC.; SCREEN)	
GEMS-EMI MUSIC INC.; SONY/ATV SONGS)	
LLC; STONE DIAMOND MUSIC CORP.;)	
COMBINE MUSIC CORP.; CONCORD MUSIC)	
GROUP, INC. d/b/a JONDORA MUSIC; SHIRLEY)	
EIKHARD USA MUSIC; EMI BLACKWOOD)	
MUSIC INC.; SONY/ATV SONGS LLC d/b/a)	
SONY/ATV TREE PUBLISHING; SONGS OF)	
UNIVERSAL, INC.,)	
)	CIVIL CASE NO. 12-CV-8090
Plaintiffs,)	
)	
v.)	
)	
BERTUCCI OF HIGHWOOD, INC. d/b/a)	
BERTUCCI'S; and BRUCE BERTUCCI, individually,)	
)	
Defendants.)	

MOTION FOR DEFAULT JUDGMENT

Pursuant to Federal Rule of Civil Procedure 55(b), and for the reasons stated in the Memorandum in Support of Motion for Default Judgment filed contemporaneously herewith, Plaintiffs respectfully move this Court for entry of default judgment ordering that:

(a) Defendants, their agents, servants, employees, and all persons acting under their permission and authority, be enjoined and restrained from infringing, in any manner, the copyrighted musical compositions licensed by BMI, pursuant to 17 U.S.C. § 502;

(b) Defendants pay statutory damages in the amount of \$20,000, which represents an award of \$2,000 for each of the ten (10) claims of infringement, pursuant to 17 U.S.C. § 504(c);

(c) Defendants pay Plaintiffs' costs, including reasonable attorney's fees in the amount of \$5,373.00, pursuant to 17 U.S.C. § 505; and

(d) Defendants pay interest on these awards pursuant to 28 U.S.C. § 1961.

This motion is supported by the Declarations of Renee S. Wolfe, Lawrence E. Stevens, and Charles A. Laff, attached hereto as Exhibits 1, 2, and 3 respectively, which establish Plaintiffs' claims for relief. A proposed Order will be sent to the Court's proposed order inbox.

Dated: February 6, 2013

Respectfully submitted,

/s/ Paul R. Coble

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